

Gorman Law PLLC  
Lauren Gorman  
NV Bar No. 11580  
275 Hill Street  
Suite 248  
Reno, NV 89501  
Tel : (775) 742-6129  
lgorman@laurengormanlaw.com

UNITED STATE DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHA-RON HAINES,

Defendant

Case No.: 2:14-cr-00264-APG-VCF

STIPULATION

IT IS HEREBY STIPULATED AND AGREED, by and between Lauren Gorman, counsel for the Defendant, and Brianna I. Chapa, Assistant United States Attorney, that any supplemental motion for compassionate release be due at a date and time convenient to the Court, but no sooner than 120 days.

This stipulation is entered into for the following reasons:

- 1) To give defense counsel time to review the record;
- 2) To give defense counsel time to contact the Defendant;
- 3) To give defense counsel the opportunity to investigate the facts underlying the *pro se* motion for compassionate release;

1 4) To give defense counsel sufficient time to draft and file a supplemental  
2 motion;

3 5) The stipulation is not sought for purposes of delay, but merely to  
4 allow counsel for the defendant sufficient time to effectively represent  
5 the Defendant.  
6

7 Dated this 20<sup>th</sup> day of August 2025

8 By: /s/Brianna I. Chapa  
9 BRIANNA I. CHAPA  
10 Assistant United States Attorney

By: /s/Lauren Gorman  
LAUREN GORMAN

UNITED STATE DISTRICT COURT  
DISTRICT OF NEVADA

STATE OF NEVADA,  
Plaintiff,

vs.

SHA-RON HAINES,  
Defendant

Case No.: 2:14-cr-00264-APG-VCF

STIPULATION

**Findings of Fact**

Based on the pending Stipulation of counsel and good cause appearing therefore, the Court finds that additional time is required:

- 1) To give defense counsel time to review the record;
- 2) To give defense counsel time to contact the Defendant;
- 3) To give defense counsel the opportunity to investigate the facts underlying the *pro se* motion for compassionate release;
- 4) To give defense counsel sufficient time to time to draft and file a supplemental motion;
- 5) The stipulation is not sought for purposes of delay but merely to allow counsel for the defendant sufficient time to effectively represent the Defendant.

**Conclusions of Law**

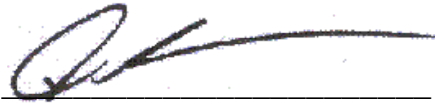
The ends of justice is served by granting said continuance. Failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly investigate and brief a motion for compassionate release, taking into account the exercise of due diligence.

**ORDER**

Any supplemental motion for compassionate release is due on or before January 13, 2026.

IT IS SO ORDERED:

Dated: August 21, 2025

A handwritten signature in dark ink, appearing to read 'A. Gordon', is written over a horizontal line.

ANDREW P. GORDON  
CHIEF UNITED STATES DISTRICT JUDGE